

Appendix B Format for submissions

Submitter	SEANZ – Gareth Willioams, Manager Innovation Pathways
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Questions	Comments
Q1. Do you agree with the issues that we have identified in meeting the policy intent to target small business consumers? Why or why not?	Yes, agree
Q2. Do you agree that applying the negative charge to business consumers below a given connection capacity, and limiting eligibility to distributed generation below that same level, will best achieve the original policy intent? Why or why not?	Yes this is logical (with note next question)
Q3. Are both limits required, or could the policy intent be achieved through just one of the proposed limits? Please explain your reasoning.	DG capacity may not need to be needed. Restricting to the connection capacity would be sufficient since the DG export would already be limited to the connection capacity
Q4. Do you agree with our assessment of the proposed threshold for connection capacity? Why or why not? Would you prefer an alternative threshold? Why?	We are not convinced of the argument to not use the <69kVa threshold. This would allow more direct identification of qualifying / potential small commercial customers from pricing categories. Given EDB's consider <69kVA as small commercial we are not clear why the premises total annual energy use is considered to be of critical relevance in this matter.
Q5. Do you agree with our assessment of the proposed threshold for DG, and that this should apply based on the maximum deliverable generation capacity? Why or why not?	As above – do not believe necessary
Q6. Do you agree with the objective of the proposed amendment? If not, why not?	Yes

Q7. Do you agree the benefits of the proposed amendment outweigh the costs?	Yes
Q8. Do you agree with our assessment of the alternatives? Please explain your reasoning.	Yes
Q9. Are there other options or thresholds we should consider to better align the Code with the original policy intent?	As per Q4
Q10. Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objectives in section 15 of the Electricity Industry Act 2010.	Agree